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January 16, 2004

ORIGINAL

BY HAND

Ms Marlene H Dortch
Secretary
Federal Communications Commission
445 12th Street, S W
Washington, D.C 20554

Re ***Ex Parte Presentation***
In the Matter of Mitigation of Orbital Debris, IB Docket No. 02-54

Dear Ms. Dortch:

This letter summarizes certain matters discussed yesterday with Commission staff

On January 15, 2003, representatives of Inmarsat Ventures Limited ("Inmarsat") had a conference call with members of the International Bureau in order to answer FCC staff questions about Inmarsat's ex parte presentation of January 9, 2003. Commission representatives were Karl Kensinger, Associate Division Chief, Satellite Division, International Bureau and John Martin, Senior Engineer, Satellite Division, International Bureau Inmarsat representatives were Ruy Pinto, Director of Satellite Control and Navigation; Dean Hope, Flight Orbital Dynamics Manager, Alan Auckenthaler, General Counsel, and John Janka of Latham & Watkins

Inmarsat explained that it currently uses a "single burn" sun-synchronous strategy to control orbital eccentricity within a ±0.10 east/west stationkeeping tolerance. Since MSS satellites fly in inclined orbits, if Inmarsat were required to reduce the tolerance to ±0.05 degrees, this could be achieved only by first changing to a modified "two-burn" strategy in order to reduce the size of eccentricity and, secondly, placing the minimum longitude excursions at the equatorial crossing This modified two-burn approach was depicted in Figure 3 of Inmarsat's January 9, 2004 ex parte submission. Inmarsat does not currently need to use a two-burn east/west stationkeeping strategy. Such a strategy consumes five times more east/west station keeping fuel, shortens the life of the satellite, and is not needed to satisfy current regulatory requirements The patent identified in Inmarsat's January 9 ex parte submission describes a related dual maneuver (also known as a two-burn method) of controlling eccentricity. MSS space station operators will need to use a modified two-burn strategy that may overlap with that patent if they are required to meet a ±0 05 degree east/west stationkeeping requirement.

Inmarsat also expressed its view, based on having operated inclined orbit spacecraft for over 14 years, that the risk of adjacent, inclined orbit spacecraft colliding due to the "overlap" of their stationkeeping boxes is extremely low Inmarsat has been able to coordinate the physical location of its spacecraft with operators of adjacent spacecraft by entering into coordination agreements with those entities and maintaining contact with them Inmarsat indicated that, in its experience, such arrangements do not adversely impact revenues, fuel budgets, the provision of service, or the use of assigned frequencies by either system

An original and one copy are enclosed.

Respectfully submitted,

John P Janka
Alexander D Hoehn-Saric

Enclosure

cc Sheryl Wilkerson
Rod Porter
John Martin
Jackie Ruff
Sankar Persaud
Steven Spaeth
Karl Kensinger
Stephen Duall
JoAnn Lucanik